



**Tennessee Department of Environment and Conservation**  
**Division of Water Pollution Control**  
**L & C Tower Annex, 6th Floor**  
**401 Church Street**  
**Nashville, Tennessee 37243**

**Phase II Stormwater Permit Notice of Intent (NOI)**  
**Phase II Municipal Separate Storm Sewer Systems (MS4)**

**PURPOSE**

The purpose of this Notice of Intent (NOI) is for a Tennessee city, county, utility district, university or military base to apply for NPDES permit to discharge stormwater runoff from a Phase II municipal separate storm sewer system.

**INSTRUCTIONS**

You must provide the following information to the Division of Water Pollution Control as application material. You may either submit a hard copy of the original NOI as described in sub-part 2.3 of the MS4 Permit, signed in accordance with the signatory requirements of sub-part 6.7 of the permit, and a copy of the NOI, to the address shown in sub-part 1.2 of the permit for the EFO responsible for the county where the facility is located; or you may submit by e-mail, with the completed NOI and attachments (such as map and city ordinances) to [phase.two@tn.gov](mailto:phase.two@tn.gov).

In addition, send an original, hard copy letter, signed by the responsible official of the MS4, which makes reference to the e-mail transmission including date and time that the electronic submitted was made. The letter must contain the signatory statement found on the NOI form. The letter must be mailed to the Nashville Central Office address as defined in sub-part 1.2 of the MS4 permit.

After completing the questions in each section, list the Best Management Practices (BMPs) that you will implement in each area based on a set of priorities you have identified in the area. Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

After completing the BMP's in each section provide the administrative information to complete those BMP's as explained here:

Primary Contact and Position/Title	The person in your organization serving as the primary contact.
Other Department and Roles	Other departments within your organization involved in the project and how their role is identified.
Other Government Entity and Roles	Identification of other government entities responsible for implementing one or more of the BMP's. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.
Other Institutions and Roles	Identification of partnerships with another MS4 operator or institution (e.g., Chamber of Commerce, environmental interest organizations, civic groups) to achieve the BMP's.
Target Groups (if applicable)	Specific kinds of groups that will be targeted, such as service industries (i.e., carpet cleaning), civic groups, schools, and church groups, etc.

**PART I**  
**ADMINISTRATIVE INFORMATION**

Name of city, county, stormwater utility district or other public institution that operates a Phase II MS4: Bluff City

J.C. Gentry

Responsible Elected Official or Officer

Vice Mayor

Title

4391 Bluff City Hwy  
Street Address

Bluff City  
City

TN  
State

37618  
Zip Code

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**PROGRAM CONTACT**

Sarah Ketron

Name

bcstormwater@aol.com

Email Address

423-220-7480

Phone Number

**TECHNICAL CONTACT**

Name

Email Address

Phone Number

☒ Attach an organizational chart that shows the different departments involved in stormwater management.

**PART II**  
**DESCRIPTION OF STORM SYSTEM**

**ITEM A**  
**AREA SERVED (IN SQUARE MILES)**

If city, town, university, or utility district: Give jurisdiction area within current corporate boundaries 4.1

If city, town, university, or utility district: Give additional area of urban growth boundary \_\_\_\_\_

If county: Give total area \_\_\_\_\_ Area unincorporated \_\_\_\_\_ Unincorporated, urbanized area (UA) \_\_\_\_\_

If county, indicate by checking the appropriate box if the permit will be used to regulate non-UA portions of your county:

Entire county (unincorporated) ☐ Non-UA portions, as follows (describe below) ☐

**ITEM B**  
**STORM DRAINAGE INFRASTRUCTURE**

Give figures for the following features of stormwater drainage infrastructure owned or operated by the local government. For a county government, indicate whether the figures represent the entire county or only the urbanized area. Figures for length and number of culverts and catch basins may be rough estimates.

For counties: Entire county ☐ Urbanized area only ☐

Storm Sewers \_\_\_\_\_ (miles, or feet)

Open Ditches \_\_\_\_\_ (miles, or feet)

Culverts \_\_\_\_\_

Catch Basins \_\_\_\_\_

Retention Basins \_\_\_\_\_

Detention Basins \_\_\_\_\_

**ITEM C**  
**MAPS**

Please include a map or maps depicting the following information. A single map may be submitted, as long as the information is legible. If you are not able to provide all the information please mark the applicable check box and attach an explanation as to why the information has not been submitted:

Zoned areas for commercial or industrial activity ☐

State vocational, technical, college or universities ☐

Actual areas of commercial or industrial activity ☐

Federal vocational, technical, college or universities ☐

Other municipally owned/operated industrial activities ☒

City Roads ☒

Municipal or County Wastewater Treatment Plants ☐

County Roads ☒

Vehicle Fleet Maintenance Centers ☒

Perennial and intermittent streams ☒

Power Plants ☐

Topography or Drainage Patterns ☒

Airports ☐

Landfills ☐

Military Installations ☐

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**ITEM D  
IDENTIFYING IMPAIRED STREAMS AND OTHER WATER BODIES**

Using the [GIS mapping tool \(http://tnmap.tn.gov/wpc/\)](http://tnmap.tn.gov/wpc/) along with the most current 303(d) list published on the division's web site (<http://www.tn.gov/environment/wpc/publications/#wqassessment>), identify whether stormwater discharges from any part of the MS4 contribute pollutants of concern to an impaired waterbody and list below: For any impairment, indicate the waterbody ID#, name of impacted waterbody, nature of pollution (cause), and the source. If you have additional streams to list, please include in a separate attachment.

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	CAUSE OF IMPAIRMENT	SOURCE OF IMPAIRMENT
6010102012-0820 Woods Branch	Alteration in stream-side or littoral cover, Loss of biological integrity due to siltation, Escherichia coli	Discharges from MS4 area (TDOT MS4)
6010102006-1000 Boone Lake	PCBs, Chlordane	Contaminated sediment
6010102012-0900 Weaver Branch	Escherichia coli	Pasture Grazing

**ITEM E  
HAS THE STATE OR EPA ISSUED A TMDL FOR ANY STREAMS DIRECTLY AFFECTED BY RUNOFF FROM YOUR MS4?**

Determine whether or not a TMDL has been established and approved by EPA and identify by checking the appropriate box. A list of EPA-Approved TMDLs as well as EPA-Established TMDLs for Tennessee waters can be found on the division's web site (<http://www.tn.gov/environment/wpc/tmdl/approved.shtml>).

Yes ☒ No ☐ If yes, list the waterbody ID#, name of impacted waterbody and parameter(s) of concern:

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	PARAMETERS OF CONCERN
60101020061000 Boone Reservoir	PCBs, Chlordane

If you have additional streams to list, please include in a separate attachment.

**PART III  
EXISTING LEGAL AUTHORITY TO CONTROL STORMWATER DISCHARGES TO MS4**

You must review ordinances that are associated with stormwater discharges to your MS4. Attach a copy of ordinances that give your MS4 the authority to control stormwater discharges into the MS4 storm sewer system. Ordinances that deal with stormwater issues might be found, for example, in conjunction with litter control, prohibition of dumping, clean up of spills, grading/building

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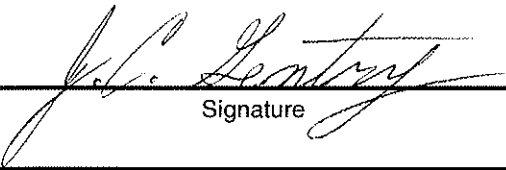

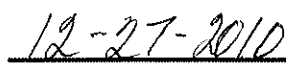
permits, sewer connection ordinances, erosion and sediment practices, subdivision regulations or other land use/development ordinances.

<b>PART IV</b> <b>SIGNATURE OF RESPONSIBLE CORPORATE OFFICER</b>
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This Notice of Intent (NOI) must be signed as follows: For a municipality, state, federal, other public agency, and/or co-permittees by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes one of the following:

- i. The chief executive officer of the agency.
- ii. A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

*"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

 _____ Signature	 _____ Title/Municipality	 _____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date

(Go to next page.)

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**PART V**  
**YOUR PROPOSED STORMWATER QUALITY MANAGEMENT PROGRAM**

This NOI requires you to provide a brief description of your current and proposed activities as well as your Best Management Practices (BMPs) for a stormwater management program. The following sections correspond to the six minimum control measures for a Phase II stormwater management program. If another MS4 will be responsible for implementing any or all portions of any or all following six minimum measures, then attach either the interlocutory agreement or the proposed agreement and schedule for adoption. You must still complete this NOI by answering the relevant questions for the six following measures.

For purposes of this NOI, the Public Education and Outreach and Public Participation and Involvement minimum measures have been combined.

**SECTION 1**  
**PUBLIC EDUCATION AND OUTREACH AND PUBLIC INVOLVEMENT/PARTICIPATION**

**A. Current Activities:**

The following is a set of questions on your current Public Education and Outreach and Public Involvement/Participation. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality currently distribute educational materials on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the materials, including media used (e.g., written brochures, public service announcements, etc.); the topic(s) covered, intended target audience(s), and the distribution method.

Yes ☒  
No ☐

Information on Pollution Prevention on the City's website

2. Does the municipality currently conduct or participate in public outreach activities focusing on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the outreach activities, topic(s) covered, intended target audience(s), and the frequency of activities.

Yes ☒  
No ☐

Annual Heritage Days, booth for local residents and visitors

3. Does the current municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes ☒  
No ☐

Notice given at City Hall per state requirements

**B. Proposed Activities:**

List the BMPs that you will implement in the areas of Public Education and Outreach and Public Participation and Involvement. These should be based on a set of priorities that you have identified in the areas of Public Education and Outreach and Public Participation and Involvement. Provide a short descriptive name to the BMP in the left column. In the right column, more fully describe the BMP.

For Public Participation and Involvement BMPs, you may not desire to dictate the ways in which the public participates or is involved in the stormwater quality management program; in this case, your proposed program should provide a forum and a structure by which to encourage or allow the public to participate. On the other hand, there may be specific ways you do want the public to be involved, based on your program needs. For instance, you may want stream watch groups to be organized. As such, your proposed program should describe how you will accomplish this, and the time schedule.

PROPOSED BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION		
BMP	Name	DESCRIPTION
1A.	Dev/Implement PIE	Public Information and Education program
1B.	Publicize	Participation opportunities
1C.	Facilitate	Opportunities for the public such as stream cleanups
1D.	Track and Maintain	Records

If you have additional BMPs to list, please include in a separate attachment.



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What specific groups will be targeted (e.g., service industries such as carpet cleaning, lawn care, civic groups, schools, church groups) if applicable:

Middle school students, general public
--

**C. Measurable Goals and Implementation Milestones**

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

**D. Administrative Information**

ADMINISTRATIVE INFORMATION FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
PRIMARY CONTACT	POSITION OR TITLE
Sarah Ketron	Stormwater Coordinator

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
City Recorder	Request maintenance of web page to host, request number of hits

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
Sullivan County School	Teaching
TNSA	Coordinate PSAs and provide materials

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

<b>SECTION 2</b> <b>ILLICIT DISCHARGE DETECTION AND ELIMINATION</b>
--

The following are common sources of illicit discharges to an MS4:

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Sanitary Wastewater</li> <li>• Car wash wastewaters</li> <li>• Radiator flushing disposal</li> <li>• Spills from roadway accidents</li> <li>• Carpet cleaning wastewaters</li> </ul> | <ul style="list-style-type: none"> <li>• Effluent from septic tanks</li> <li>• Improper oil disposal</li> <li>• Laundry Wastewaters/gray water</li> <li>• Improper disposal of auto and household toxics</li> </ul> |
|---|---|

**A. Current Activities**

The following is a set of questions on your current Illicit Discharge Detection and Elimination Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

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**STORM SEWER SYSTEM MAP**

Does the municipality currently have a storm sewer system map completed for the entire regulated municipal separate storm sewer system? The map must depict, at a minimum: city streets, topography or drainage patterns, streams, and outfalls (points where the city or county-operated MS4 discharges into the streams or adjacent MS4s).

Yes ☒

No ☐

**ILLICIT DISCHARGE ORDINANCES**

1. Does the municipality currently have an ordinance or regulatory mechanism that prohibits non-stormwater discharges into the storm sewer system? If yes, please attach a copy of the ordinance and give page number(s) of this section of ordinance. If No, proceed to the next section (inspections and enforcement).

Yes ☒ No ☐

Page Number  
25

2008- Ordinance Section Number  
001Sec.  
8(2)

2. Does the ordinance or regulatory mechanism clearly define non-stormwater discharges, either through a written description of a non-stormwater discharge or through a listing of unallowable or allowable non-stormwater discharges?

Yes ☒

No ☐

3. Does the ordinance or regulatory mechanism allow right-of-entry on private property for inspection of suspected discharges?

Yes ☐

No ☒

4. Does the ordinance or regulatory mechanism prohibit dumping?

Yes ☐

No ☒

5. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to eliminate non-stormwater discharges in the event of violations? If yes, please note page number and paragraph number.

Yes ☐ No ☒

Page Number

Paragraph Number

6. Does the ordinance or regulatory mechanism define penalties for violations? If yes, please note maximum penalty, page number and paragraph number.

Yes ☒ No ☐

\$5,000

Maximum Penalty

30

Page Number

10(2)

Paragraph Number

7. Does the municipality have ordinance or other regulatory mechanism that prohibits contamination of stormwater runoff from "hot spots" including industrial and commercial properties, restaurants, auto repair shops, auto supply shops, and large commercial parking areas?

Yes ☐

No ☒

**INSPECTION/SCREENING AND ENFORCEMENT PROCEDURES**

1. Does the municipality presently have personnel and procedures in place for inspection and/or screening for non-stormwater discharges? If yes, please describe and indicate percentage of system inspected and/or screened.

Yes ☒

No ☐

2. Does the municipality presently have procedures and personnel in place for enforcement of violations of the illicit discharge ordinance? If yes, please describe.

Yes ☒

No ☐

Per 2008-001(9)

3. How are enforcement actions documented?

Written notice or noted in file/complaint log

4. Has the municipality defined "hot spots" for non-stormwater discharge screening and inspections? If yes, please describe and provide a map of illicit discharge screening hot spots.

Yes ☐

No ☒

Mapping in progress

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**PUBLIC INPUT AND COMPLAINTS**

1. Does the municipality presently have procedures in place to receive and consider information and complaints about non-stormwater discharges that are submitted by the public? If so, provide brief description: responsible departments, personnel, steps followed.

Yes ☒  
No ☐

Binder in City Hall with tracking sheet. Office personnel take complaint, Stormwater Coordinator handles.

**EDUCATION**

1. Has the municipality educated the public and businesses including auto parts supply, auto repair shop and restaurants, regarding ways to detect, prevent and eliminate illicit discharges? If yes, briefly describe the educational materials, including media used (e.g., written brochures, public service announcements, etc.), the topic(s) covered, intended target audience(s), and the distribution method.

Yes ☒  
No ☐

Web and brochures mailed to businesses

**B. Proposed Activities:**

List the best management practices (BMPs) that you will implement in the area of Illicit Discharge Detection and Elimination. These should be based on a set of priorities that you have identified in the area of Illicit Discharge Detection and Elimination. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR ILICIT DISCHARGE DETECTION AND ELIMINATION		
BMP	Name	DESCRIPTION
2A	Map of System	Maintain map of storm sewer system
2B	Ordinance	Uphold ordinance prohibiting illicit discharges and implement ERP
2C	Screen/Inspect/Enforce	Perform illicit discharge inspections and hotspot evaluations
2D	Training/Information	Continue training activities for city personnel/inform industrial and other entities about the hazards associated with illicit discharges

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Restaurants, automotive facilities

**C. Measurable Goals and Implementation Milestones**

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

**D. Administrative Information**

ADMINISTRATIVE INFORMATION FOR ILICIT DISCHARGE DETECTION AND ELIMINATION	
PRIMARY CONTACT	POSITION OR TITLE
Sarah Ketron	Stormwater Coordinator

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Bluff City P.D.	Enforcement of the code

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.



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ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

**SECTION 3**  
**CONSTRUCTION SITE STORMWATER RUNOFF PROGRAM**

**A. Current Activities**

The following is a set of questions on your current Construction Site Stormwater Runoff Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

**CONSTRUCTION SITE RUNOFF ORDINANCES**

1. Do the current ordinances/regulations for the municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes ☒  
 No ☐

Fliers posted at City Hall in accordance with state rules

2. Do you currently have an erosion prevention and sediment control - or similar - ordinance or regulatory mechanism? If yes, include a copy and reference the page number(s). If No, proceed to the next set of questions below about construction site plans review.

Yes ☒

No ☐

Bluff City Stormwater Ordinance  
 2008-001  
 pp.7-20

3. Does the ordinance or regulatory mechanism require that site operators implement erosion prevention, sediment control, and other construction waste controls for land disturbance activities?

Yes ☒

No ☐

4. Does the ordinance/regulatory mechanism require (explicitly or implicitly) that controls be implemented for any land disturbances greater than or equal to one acre, or less than one acre if part of a large common plan of development or sale that would disturb one acre or more? If yes, note the page number and paragraph number where this is defined.

Yes ☒ No ☐

7 Page Number

3(a) Paragraph Number

5. Does the ordinance or regulatory mechanism contain or reference technical standards for erosion and sediment control? If yes, note the page number and paragraph number where this is defined.

Yes ☒ No ☐

2009-004 Page Number

1.A Paragraph Number

6. Do those technical standards meet or exceed the current effective Tennessee Construction General Permit (TNR100000) requirements for design storm and special conditions for impaired waters or exceptional waters?

Yes ☒

No ☐

7. Do those technical standards require that construction activities maintain temporary water quality buffers during construction?

Yes ☒

No ☐

8. Does the ordinance or regulatory mechanism clearly define the criteria - primarily who must submit - for submitting erosion and sediment control information or plans? If yes, note page number and paragraph number

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Yes ☐ No ☒ \_\_\_\_\_ Page Number \_\_\_\_\_ Paragraph Number

9. Does the ordinance or regulatory mechanism require approval by the local government prior to commencement of land disturbance activities? If yes, note page number and paragraph number.

Yes ☒ No ☐ 10 Page Number (5)(a)(3)(c) Paragraph Number

10. Does the ordinance or regulatory mechanism require re-submittal of erosion and sediment control information or plans if site plans or conditions change during land disturbance activities? If yes, note page number and paragraph number.

Yes ☐ No ☒ \_\_\_\_\_ Page Number \_\_\_\_\_ Paragraph Number

11. Does the ordinance or regulatory mechanism allow right-of-entry for government officials onto construction sites for inspections? If yes, note page number and paragraph number.

Yes ☒ No ☐ 25 Page Number Sec. 7 Existing Paragraph Number  
Areas(3)

12. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to STOP WORK in the event of non-compliance violations? If yes, note page number and paragraph number.

Yes ☐ No ☒ \_\_\_\_\_ Page Number \_\_\_\_\_ Paragraph Number

**CONSTRUCTION SITE PLANS REVIEW**

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment construction for construction site runoff?

Yes ☒ No ☐

2. Does the technical review process require an erosion prevention and sediment control plan with appropriate BMPs?

Yes ☒ No ☐

3. Does the review process include a requirement for pre-construction meeting between the municipality and site developer, for priority construction sites, including at a minimum those construction activities discharging directly into, or immediately upstream of, waters the state recognizes as impaired or exceptional?

Yes ☒ No ☐

4. If there is a review process, provide a brief narrative or a flow chart of the process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

Attached

**RESPONDING TO PUBLIC INPUT AND COMPLAINTS**

1. Does the municipality presently have procedures in place for receipt and consideration of information and complaints submitted by the public?

Yes ☒ No ☐

If Yes, please provide a brief narrative of the receipt process and procedures, describing process steps, responsible departments, and personnel (by title). If available, provide information on complaint tracking, documentation, etc:

Complaint tracking log in City Hall for phone and face-to-face complaints. Each complaint is logged and comments are made on a sheet and numbered.

**ENFORCEMENT AND INSPECTION PROCEDURES**

1. Does the municipality presently have personnel and procedures in place for construction site runoff inspection?

Yes ☒ No ☐

2. Does the program provide for pre-construction meeting and monthly inspection of priority sites?

Yes ☒ No ☐

3. Does the municipality presently have procedures and personnel in place for enforcement to the maximum extend for violations of construction site requirements?

Yes ☒ No ☐

4. Does the municipality use a STOP WORK order to enforce non-compliance with construction site policies and requirements?

Yes ☐ No ☒

5. How are enforcement actions documented?

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Inspection forms(and photos, if applicable) are completed for each inspection. Written notice is given to violators.

**TRAINING AND EDUCATION**

1. Does the municipality presently make construction site runoff control training/information available to the public, developers, engineers, and contractors? (Be aware that the state of Tennessee regularly conducts erosion prevention and sediment control classes across the state. Local governments are encouraged to refer developers and contractors to these classes).

Yes ☐

No ☒

2. Has municipal staff completed state-sponsored training, including the Tennessee Fundamentals of Erosion Prevention and Sediment Control; and the Erosion Prevention and Sediment Control Design Course?

Yes ☒

No ☐

**B. Proposed Activities:**

List the best management practices (BMPs) that you will implement in the area of Construction Site Runoff Program. These should be based on a set of priorities that you have identified in the area of Construction Site Runoff Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM		
BMP	Name	DESCRIPTION
3A.	Ordinance	Uphold and maintain ordinance, require the control of wastes on construction sites
3B.	Dev/mntn invtry active site	Utilize tracking number and collect name, address, phone, size of project, area of disturb, whether project submitted TCGP and date MS4 operator approved the plan
3C.	Procedures	Site plan review, manage public input, site inspection and enforcement, and provide for priority const. sites: identify, hold pre-construction meetings, inspections at least once per month
3D.	Staff training	Inspector certification

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Developers

**C. Measurable Goals and Implementation Milestones**

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

**D. Administrative Information**

ADMINISTRATIVE INFORMATION FOR CONSTRUCTION SITE RUNOFF PROGRAM	
PRIMARY CONTACT	POSITION OR TITLE
Sarah Ketron	Stormwater Coordinator

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

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Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

**SECTION 4**  
**PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT**  
**IN NEW DEVELOPMENT AND REDEVELOPMENT PROGRAM**

**A. Current Activities**

The following is a set of questions on your current Permanent Stormwater Management in New Development and Redevelopment Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

**STRUCTURAL AND NON-STRUCTURAL STRATEGIES**

1. Does the municipality currently have in place mechanisms or strategies to address permanent stormwater runoff management from new development or redevelopment projects that result in land disturbance of one acre or more? For example, land use planning requirements, zoning directives, site-based local controls such as riparian buffer zone protection; storage or detention of stormwater prior to release to streams; practices to cause stormwater to percolate the soil rather than runoff immediately; vegetative practices.

Yes ☒

No ☐

If Yes, please provide a brief narrative of - and/or references to - the structural and non-structural strategies, describing strategies implemented, Best Management Practices allowed, technical guidance, responsible departments, and personnel (by title).

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**PERMANENT STORMWATER CONTROLS SITE MANAGEMENT ORDINANCE**

1. Do you currently have an ordinance or regulatory mechanism that addresses permanent stormwater runoff management from new development and redevelopment projects? If yes, reference the page number in your ordinance. If No, proceed to the next section on permanent stormwater management plans review.

Yes ☒ No ☐

2008-001, Page Number  
pp. 20-22

5 Paragraph Number

2. Does the ordinance or regulatory mechanism require controls to mitigate pollutants in stormwater runoff? If yes, note page number and paragraph number.

Yes ☐ No ☒

Page Number

Paragraph Number

3. Does the ordinance or regulatory mechanism require (explicitly or implicitly) that controls be implemented for any new development or redevelopment projects greater than or equal to one acre, including projects less than one acre that are part of a large common plan of development or sale, that discharge into your small MS4? If yes, note page number and paragraph number.

Yes ☐ No ☒

Page Number

Paragraph Number

4. Does the ordinance or regulatory mechanism contain or reference technical standards for water quality controls (e.g., design of detention basins)? If yes, note page number and paragraph number.

Yes ☒ No ☐

2009-004 Page Number

1.B Paragraph Number

5. Does the ordinance or regulatory mechanism clearly define the criteria for submittal -who must submit - of permanent stormwater management design information or plans? If yes, note page number and paragraph number.

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Yes ☐ No ☒ \_\_\_\_\_ Page Number \_\_\_\_\_ Paragraph Number

6. Does the ordinance or regulatory mechanism require approval prior to construction of permanent stormwater management controls? If yes, note page number and paragraph number.

Yes ☐ No ☒ \_\_\_\_\_ Page Number \_\_\_\_\_ Paragraph Number

7. Does the ordinance or regulatory mechanism require re-submittal of permanent stormwater management design information or plans if site plans change after the initial design has been approved? If yes, please note page number and paragraph number.

Yes ☐ No ☒ \_\_\_\_\_ Page Number \_\_\_\_\_ Paragraph Number

8. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to penalize the owner of permanent stormwater management controls for violations? If yes, note page number and paragraph number.

Yes ☐ No ☒ \_\_\_\_\_ Page Number \_\_\_\_\_ Paragraph Number

9. Does the ordinance or regulatory mechanism allow the municipality right-of-entry on property where permanent stormwater management controls are installed for inspections? If yes, please note page number and paragraph number.

Yes ☐ No ☒ \_\_\_\_\_ Page Number \_\_\_\_\_ Paragraph Number

10. Does the ordinance or regulatory mechanism require that permanent stormwater management controls have adequate and long-term operation and maintenance? If yes, please note page number and paragraph number. If no, how does the MS4 owner/operator maintain permanent stormwater management controls?

Yes ☒  
No ☐

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11. Does the ordinance or regulatory mechanism require establishment and maintenance of water quality buffers in areas of new development and redevelopment?

Yes ☒

No ☐

**PERMANENT STORMWATER MANAGEMENT PLANS REVIEW**

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment with regard to the impact that permanent stormwater runoff will have on receiving streams?

Yes ☒

No ☐

If Yes, provide a brief narrative or a flow chart of the review process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

Attached

**B. Proposed Activities:**

List the best management practices (BMPs) that you will implement in the area of the Permanent Stormwater Management Plans Review Program. These should be based on a set of priorities that you have identified in the area of the Permanent Stormwater Management Plans Review Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW		
BMP	Name	DESCRIPTION
4A.	Ordinance	Uphold and improve ordinance, include BMP maintenance
4B.	Performance Standards	Develop standards by which to enforce permanent stormwater controls, such as runoff reduction (green infrastructure), pollutant removal, off-site mitigation, payment into a public sw project fund.
4C.	Codes/Ord. Review	Utilise the Water Quality Scorecard to revise policies, codes and ordinances to achieve "the greatest improved protection of receiving waters".
4D.	Dev. Project Plan Review, Approval and Enforcement	Develop and include in the Enforcement Response Plan

If you have additional BMPs to list, please include in a separate attachment.

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What specific groups will be targeted, if applicable?

Development

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW	
PRIMARY CONTACT	POSITION OR TITLE
Sarah Ketron	Stormwater Coordinator

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Planning Zoning Board	Review/Approval process

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
Contract Eng. firm TBD	Technical Review (not of own work)

**SECTION 5**  
**POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS**

A. Current Activities

The following is a set of questions on your current Pollution Prevention/Good Housekeeping for Municipal Operations Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

**STAFF EDUCATION AND TRAINING**

1. Does the municipality's current operation and maintenance program provide annual training for staff on preventing and reducing stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance?

Yes ☒

No ☐

2. Are training activities documented? If yes, please describe training and method of record-keeping.

Yes ☒

Sign-in sheet, topics discussed



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No ☐

**MUNICIPAL OPERATIONS POLLUTION PREVENTION**

1. Does the municipality's operations and maintenance program have policies and procedures in place that address pollution prevention? If yes, please describe procedures. Consider the following in your response: maintenance activities, maintenance schedules; long term inspection procedures for structural and non-structural stormwater controls to reduce floatables and other pollutants; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways; controls for reducing or eliminating pollutants from municipal parking lots, maintenance and storage yards, fleet or maintenance areas with outdoor storage areas, salt/sand storage areas, snow disposal areas, waste transfer stations; disposal of waste removed from storm sewers and the areas listed above; and assessment of impacts on water quality from new flood management projects.

Yes ☒  
 No ☐

Reducing pollutants from garage

**MUNICIPAL INDUSTRIAL ACTIVITIES**

1. Has the MS4 owner/operator obtained a Tennessee Multi-Sector General Permit or a no-exposure waiver for all qualifying municipal industrial activities? If yes, please give permit numbers or attach copies of the No-Exposure Certification form.

Yes ☐

No ☒

Permit Numbers(s)

2. List municipally-owned or operated facilities that have a notable potential for contaminating runoff: for example - vehicle maintenance garages; waste transfer operations; golf courses; salt or other materials storage; landfill. If more than one facility for a given type of operation; give the number of such facilities. Indicate if any of these are covered by an NPDES permit. Is there a documented pollution prevention plan in place for these facilities?

FACILITY OR TYPE OF OPERATION	NUMBER OF FACILITIES	IS ACTIVITY COVERED BY NPDES PERMIT?	IS A POLLUTION PREVENTION PLAN IN EFFECT?
Vehicle Maintenance Garage		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Salt Storage		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>

**B. Proposed Activities:**

List the best management practices (BMPs) that you will implement in the area of the Pollution Prevention and Housekeeping Program. These should be based on a set of priorities that you have identified in the area of the Pollution Prevention and Housekeeping Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

In addition to considering industrial-type operations, you must also consider municipal infrastructure, and related maintenance activities, maintenance schedules and long-term inspection procedures for structural controls and the proper disposal of waste from storm sewers/catch basins, etc. Also included in this program area is discharge of pollutants from roads and parking lots

**PROPOSED BEST MANAGEMENT PRACTICES FOR POLLUTION PREVENTION AND HOUSEKEEPING**

BMP	Name	DESCRIPTION
5A.	Maintenance Program	Includes reporting of problems observed to SW Coordinator for handling
5B.	Employee Training	Offered at least once per year
5C.		
5D.		

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Public Works

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C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR POLLUTION PREVENTION AND HOUSEKEEPING	
PRIMARY CONTACT	POSITION OR TITLE
Sarah Ketron	Stormwater Coordinator

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Public Works	

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

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**ADDENDUM TO SMALL MS4 NPDES PERMIT NOTICE OF INTENT**  
**BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND MILESTONES**

The purpose of this addendum is to record the measurable goals for each BMP, and the dates (month and year) by which interim actions are to be accomplished. Space is given for four BMPs for each of the six minimum measures. If necessary, please attach additional BMP MEASURABLE GOALS AND MILESTONES as a separate attachment.

Measurable goals are BMP design objectives, or goals that will quantify the progress of implementing the actions or performance of a BMP. They are ways to measure activities or effects of a BMP. For each of the six minimum measures and for each BMP, define the measurable goal you will use to monitor effectiveness of this BMP. The BMPs you list here should match exactly those given in Part V., 1-5 of this NOI. For purposes of this NOI, the Public Education and Outreach and Public Involvement/Participation minimum measures have been combined.

For each BMP, establish milestones for implementation. These tables are set up for once/year milestones. You may change the milestone dates to time frames less than one year.

<b>BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION</b>	
<b>BMP 1A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Develop PIE
Milestone Year 1	Develop Website to address the general public on maint, storage, disposal, application of chem.
Milestone Year 2	Improve website to include identifying and reporting illicit discharges
Milestone Year 3	Develop materials for local engineering development community and prof. chem. applicators
Milestone Year 4	Inform employees and contractors of water quality impacts from daily operations
Milestone Year 5	Track and document number of hits, materials distributed, contacts made
<b>BMP 1B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Publicize program participation opportunities
Milestone Year 1	Assess the intended audience
Milestone Year 2	Develop materials
Milestone Year 3	Distribute materials and information
Milestone Year 4	Track and record number distributed
Milestone Year 5	Track and record number distributed
<b>BMP 1C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Facilitate opportunities for citizen involvement
Milestone Year 1	Utilize statewide PSA program
Milestone Year 2	Pay fee
Milestone Year 3	Pay fee
Milestone Year 4	Pay fee
Milestone Year 5	Pay fee
<b>BMP 1D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Continue public noticing efforts in accordance with state law
Milestone Year 1	Track and record number of notices
Milestone Year 2	Track and record number of notices
Milestone Year 3	Track and record number of notices
Milestone Year 4	Track and record number of notices
Milestone Year 5	Track and record number of notices

<b>BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION</b>	
<b>BMP 2A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>

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Goal(s)	Update and improve storm sewer system map
Milestone Year 1	Inventory and add information on inlets, catch basins, drop structures or other structures
Milestone Year 2	Inventory and add information on inlets, catch basins, drop structures or other structures
Milestone Year 3	Inventory and add information on inlets, catch basins, drop structures or other structures
Milestone Year 4	Create map of inventoried items
Milestone Year 5	Maintain map

<b>BMP 2B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Ordinance to authorize illicit discharge detection and elimination program
Milestone Year 1	Identify changes, if needed, to meet the requirements, develop or incorporate existing ERP
Milestone Year 2	Implement changes needed for ERP, if applicable, (by 18 months of permit coverage)
Milestone Year 3	Assess current ordinance for other needs, besides ERP, to meet the requirement
Milestone Year 4	Propose and implement changes, if any
Milestone Year 5	Uphold ordinance

<b>BMP 2C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Illicit discharge inspection and Screening Procedures
Milestone Year 1	Assess current procedures
Milestone Year 2	Identify needed changes
Milestone Year 3	Incorporate changes and improve or develop tracking system
Milestone Year 4	Continue to implement inspection and screening program
Milestone Year 5	Continue to implement inspection and screening program

<b>BMP 2D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste
Milestone Year 1	Continue to recognize non-stormwater discharges that are not significant contributors of pollutants
Milestone Year 2	Continue to identify hotspots and implement procedures for public reporting of suspected discharges, including requirement to respond to public complaints within 7 days of report
Milestone Year 3	Foster inter-agency coordination of hazardous waste or material spills response cleanup
Milestone Year 4	Continue to implement procedures
Milestone Year 5	Continue to implement procedures

<b>BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM</b>	
<b>BMP 3A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Construction site stormwater runoff program
Milestone Year 1	Assess and identify code and ordinance changes
Milestone Year 2	Propose and implement changes (within 18 months of permit coverage)
Milestone Year 3	Uphold and maintain ordinance
Milestone Year 4	Uphold and maintain ordinance
Milestone Year 5	Uphold and maintain ordinance
<b>BMP 3B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Develop and maintain inventory of all active public and private construction sites
Milestone Year 1	Improve on current tracking procedures (within 12 months of permit coverage)
Milestone Year 2	Maintain tracking system
Milestone Year 3	Maintain tracking system
Milestone Year 4	Maintain tracking system

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Milestone Year 5	Maintain tracking system
<b>BMP 3C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Dvlp or continue procedures for site plan review, managing public input, and site inspection, including ERP
Milestone Year 1	Review, assess and amend current procdures and add new ones to meet the requirements
Milestone Year 2	Review, assess and amend current procdures and add new ones to meet the requirements
Milestone Year 3	Implement procedures
Milestone Year 4	Implement procedures
Milestone Year 5	Implement procedures
<b>BMP 3D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	MS4 Staff Training
Milestone Year 1	Maintain certification under Level 1 and Level 2
Milestone Year 2	Maintain certification under Level 1 and Level 2
Milestone Year 3	Maintain certification under Level 1 and Level 2
Milestone Year 4	Maintain certification under Level 1 and Level 2
Milestone Year 5	Maintain certification under Level 1 and Level 2

<b>BEST MANAGEMENT PRACTICES FOR PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM</b>	
<b>BMP 4A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Improve Ordinance to meet requirement for permanent sw controls, including rqt. for maintenance
Milestone Year 1	Assess current ordinance
Milestone Year 2	Develop ordinance language to require maintenance of BMPs, and sanctions to ensure compliance
Milestone Year 3	Develop ordinance language to require maintenance of BMPs, and sanctions to ensure compliance
Milestone Year 4	Propose and implement changes
Milestone Year 5	Uphold ordinance
<b>BMP 4B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Implement and enforce permanent SW controls, including a plan for allowing for alternatives, such as mitigation sites
Milestone Year 1	Ensure the City has the authority to do so through ordinance
Milestone Year 2	Ensure the City has the authority to do so through ordinance
Milestone Year 3	Ensure the City has the authority to do so through ordinance
Milestone Year 4	Ensure the City has the authority to do so through ordinance
Milestone Year 5	Require site design standards that include Runoff reduction, Pollutant removal, Off-site mitigation, Payment into a SW project fund
<b>BMP 4C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Codes and ordinances review and update
Milestone Year 1	Assess current ordinance and identify amendments using the WQ Scorecard
Milestone Year 2	Propose changes
Milestone Year 3	Propose changes
Milestone Year 4	Adopt and uphold ordinance that meets requirements (by 48 months of permit coverage)
Milestone Year 5	Uphold ordinance
<b>BMP 4D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Development project plan review, approval and enforcement
Milestone Year 1	Incorporate procedures in Enforcement Response Plan
Milestone Year 2	Develop process for review, re-submittal, and approval of plans, including inter-departmental

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	consultations and accounting for changes made to the plan
Milestone Year 3	Develop procedures for identifying how performance standards are being met and how long-term maintenance will be ensured
Milestone Year 4	Develop procedures for verifying that BMPs have been installed correctly and enforcement to ensure compliance
Milestone Year 5	Implement procedures using authority provided in ordinance

<b>BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING</b>	
<b>BMP 5A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Pollution Prevention and Good Housekeeping for Municipal Operations
Milestone Year 1	Assess and improve upon current procedures
Milestone Year 2	Modify procedures, if necessary
Milestone Year 3	Continue to implement current procedures, or begin to implement new procedures, if applicable
Milestone Year 4	Implement and track and document activities
Milestone Year 5	Implement and track and document activities
<b>BMP 5B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Employee training
Milestone Year 1	Implement current program of offering training opportunities to public works staff , document accdgly
Milestone Year 2	Track number and type of training events and who attended
Milestone Year 3	Track number and type of training events and who attended
Milestone Year 4	Track number and type of training events and who attended
Milestone Year 5	Track number and type of training events and who attended
<b>BMP 5C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	
Milestone Year 5	
<b>BMP 5D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	
Milestone Year 5	